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5 Attorney for Defendant,
6 KAREN BREDICE

FILED

AUG 22 2005

CLERK, U.S. DISTRICT COURT
BY _____
DEPUTY CLERK

8 UNITED STATES DISTRICT COURT

9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 KAREN BREDICE,

14 Defendant.

15 Case Number: CR S-03-148 GEB

16 } STIPULATION FOR ORDER (1) ISSUING
17 } SUBPOENA *DUCES TECUM* UNDER RULE
18 } 17(c) TO S.A.B. MEDICAL GROUP, INC.
19 } AND FRANK BREDICE, D.C.; (2)
20 } DIRECTING THAT PRODUCTION BE
21 } MADE PRIOR TO TRIAL DATE *J ORDER*

22 } Date: _____, 2005 *GP*

23 } Time:

24 } Dept.: Courtroom 10

25 } HONORABLE JUDGE GARLAND E.
26 } BURRELL, JR.

27 TO ALL PARTIES HEREIN AND THEIR ATTORNEYS OF RECORD AND TO THE
28 ABOVE-ENTITLED COURT:

29 PLAINTIFF AND DEFENDANT HEREBY STIPULATE AND AGREE, after reviewing the
30 *EX PARTE APPLICATION* BY DEFENDANT KAREN BREDICE FOR ORDER (1) ISSUING
31 SUBPOENA *DUCES TECUM* UNDER RULE 17(c) TO S.A.B. MEDICAL GROUP, INC. AND
32 FRANK BREDICE, D.C.; (2) DIRECTING THAT PRODUCTION BE MADE PRIOR TO TRIAL
33 DATE; MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATION OF COUNSEL;
34 [PROPOSED] ORDER filed by Defendant Karen Bredice, that a subpoena *duces tecum* under Rule
35 17(c) should be directed to S.A.B. Medical Group, Inc. and Frank Bredice, D.C. for the production the
36 complete patient files of S.A.B. Medical Group, Inc. for the period of January 1998 through September

1 2000, including all billings statements and fee slips, for inspection by both the prosecution and the
2 defense in this matter.

3 Dated: August ____, 2005

Respectfully Submitted,
GILBERT R. GEILIM.
A PROFESSIONAL LAW CORP.

5 /s/

6 BY: **GILBERT R. GEILIM, ESQ.,**
7 Attorney for Defendant,
KAREN BREDICE

8
9 DATED: August ____, 2005

U. S. ATTORNEY'S OFFICE

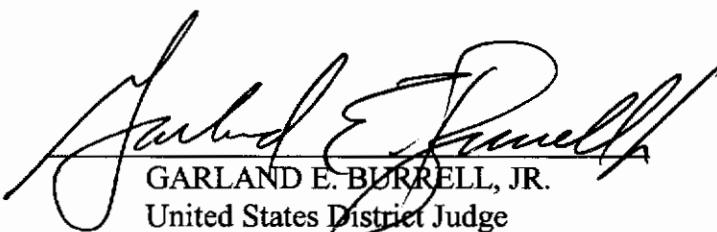
10 /s/

11 BY: **DANIEL S. LINHARDT,**
12 Assistant United States Attorney

13
14 Based on the parties' Stipulation filed August 12,
15 2005, and consistent with Defendant's proposed Order concerning
16 the subject documents, S.A.B. Medical Group, Inc., and Frank
17 Bredice, D.C., are to provide the subject documents to Cathleen
18 A. Connolly, Special Agent, Federal Bureau of Investigation,
19 11000 Wilshire Blvd., Suite 1700, Los Angeles, CA 90024, no later
20 than September 23, 2005.

21
22 IT IS SO ORDERED.

23
24 DATED: August 18, 2005

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28 
GARLAND E. BURRELL, JR.
United States District Judge